

RICE & BRONITSKY  
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Attorneys for Plaintiff  
STEVEN NERAYOFF

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

STEVEN NERAYOFF,

Plaintiff,

v.

RAGER, BELL, DOSKOCIL and MEYER,  
BRAD DOSKOCIL,

Defendants.

Case No.: C-07-03101 JW

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING CASE  
MANAGEMENT CONFERENCE**

**Date:** January 28, 2008  
**Time:** 10:00 a.m.  
**Ctrm.:** 8, 4<sup>th</sup> Floor

COME NOW the parties, Plaintiff Steven Nerayoff ("Plaintiff") and Defendants Rager, Bell, Daskocil and Meyer ("RBDM"), Rossi, Daskocil & Finkelstein, LLP ("RDF") and Brad Daskocil ("Daskocil") (collectively the "Parties"), by and through their counsel of record and as a stipulation in the above-referenced matter, state as follows:

1. Defendants RBDM, RDF and Daskocil appear specially before the Court in this Stipulation for the sole purpose stated herein and do not waive any and/or all objections that may be asserted as to venue. Further, this Stipulation is entered into and this special appearance is made by RBDM, RDF, and/or Daskocil without any prejudice to RBDM, RDF, and/or Daskocil's ability to bring a motion for an order dismissing this action and/or transferring this action on the grounds that venue in the Northern District is improper.

2. The Parties previously entered a Stipulation seeking a continuance of the Case Management Conference and the deadline for Defendants to respond to the Complaint. The Stipulation was filed on December 13, 2007. The Order granting the continuance was filed on December 14, 2007.

3. The Parties enter this Stipulation and seek a continuance of the Case Management Conference, currently scheduled for January 28, 2008, at 10:00 a.m., as Plaintiff's counsel is not available to appear on January 28, 2008, due to other court appearances scheduled for that date.

4. The Parties request that the Case Management Conference be continued to February 25, 2008, and that the deadline for filing the Joint Case Management Statement be continued to February 15, 2008.

5. The Parties stipulate that they be allowed to reserve their right to seek further enlargement of time and propose a modified case management plan consistent with the Standing Order for All Judges of the Northern District of California, Contents of Joint Case Management Statement.

DATED: December 21, 2007 **RICE & BRONITSKY**

By: /s/ Paul E. Rice  
Paul E. Rice  
Attorney for Plaintiff Steven Nerayoff

DATED: December 21, 2007 **CHAPMAN, GLUCKSMAN & DEAN**  
A Professional Corporation

By: /s/ Stephanie Sessions Perkins  
Stephanie Sessions Perkins  
Attorneys for Specially Appearing Rager, Bell, Doskocil and  
Meyers and Specially and Jointly Appearing Brad Dosckocil,  
CPA

1 DATED: December 21, 2007

**FARBSTEIN & BLACKMAN**  
A Professional Corporation

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3  
4 By: /s/ John S. Blackman  
John S. Blackman  
5 Attorneys for Specially Appearing Defendant Rossi,  
Doskcocil & Finkelstein and Specially and Jointly Appearing  
6 Defendant Brad Dosckocil, CPA  
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10 Pursuant to Stipulation, **IT IS SO ORDERED.**  
11

12 Dated: \_\_\_\_\_

\_\_\_\_\_  
JAMES WARE  
United States District Judge

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